

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	CASE NO. 1:18-CR-708
	)	
Plaintiff,	)	JUDGE CHRISTOPHER A. BOYKO
	)	
v.	)	
	)	<b>DEFENDANT’S MOTION TO FILE <i>EX</i></b>
KENNETH TYSON,	)	<b><i>PARTE</i> HIS RESPONSE TO THE GOV-</b>
	)	<b>ERNMENT’S NOTICE OF POTENTIAL</b>
Defendant.	)	<b>VIOLATION OF PROTECTIVE ORDER</b>

Defendant Kenneth Tyson, through counsel, respectfully requests that he be permitted to file his response to the government’s Notice of Potential Violation of Protective Order (Sealed Doc. 67) *ex parte*. Mr. Tyson has fully complied with the Protective Order, which applies by its terms only to Discovery Material (*i.e.*, material received from the government in discovery). Defendant’s response to the Notice includes a discussion of certain non-government sources of defense information, which requires revealing defense strategy and work product to which the government is not entitled, potentially including protected attorney-client communications.

Respectfully submitted,

/s/ Chris N. Georgalis

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 8, 2019, a copy of the foregoing was filed electronically.  
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.  
Parties may access this filing through the Court's system.

/s/ Chris N. Georgalis  
Christos N. Georgalis

*Attorney for Defendant Kenneth Tyson*